

EXHIBIT 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
vs.) Case No.
17-cv-00939-WHA
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
)
Defendants.)
)
_____)

HIGHLY CONFIDENTIAL--OUTSIDE COUNSEL'S EYES ONLY
VIDEOTAPED DEPOSITION OF
OGNEN STOJANOVSKI, ESQ.
San Francisco, California
Thursday, July 20, 2017
Volume I

Reported by:
MARY J. GOFF
CSR No. 13427
Job No. 2663397
PAGES 1-321

1 Q And what else have you -- well, let me ask 09:22:15
2 it this way: What else have you communicated with 09:22:18
3 Steve Nunnemaker about with respect to accounting 09:22:23
4 services? 09:22:26

5 A I have referred clients of mine to his 09:22:26
6 accounting firm for their own accounting needs. 09:22:30

7 Q Have you ever, on behalf of any other 09:22:33
8 clients, communicated with Mr. Nunnemaker about 09:22:38
9 accounting services? 09:22:41

10 A No, I wouldn't say on behalf of. I have 09:22:45
11 had clients who have asked, Do you know any 09:22:48
12 accountants, and I have referred them to Steve to 09:22:50
13 see if he could meet their needs. 09:22:53

14 Q How did you -- well, let me -- let me ask 09:22:57
15 it a better way. 09:23:00

16 How did Mr. Nunnemaker be -- end up 09:23:02
17 becoming the accountant for Sandstone? 09:23:06

18 MR. SAWYER: Objection, form. 09:23:11

19 MS. RAY: Join. 09:23:13

20 A He was the accountant for -- my 09:23:13
21 understanding is he was the accountant for 09:23:18
22 Sandstone's parent. And Sandstone being a 09:23:20
23 pass-through entity for accounting purposes. 09:23:24
24 He's -- its accountant as well. That's the most 09:23:27
25 straightforward way to do it. 09:23:32

1

[REDACTED]

09:34:03

2

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MS. RAY: Objection, form. 09:35:21

2 MR. SAWYER: Join. 09:35:22

3 A I don't know for sure why he asked me to 09:35:24

4 be the manager of Sandstone Group. 09:35:26

5 Q (BY MR. JUDAH) Do you have any 09:35:28

6 understanding why you were selected to be the 09:35:30

7 manager of Sandstone Group? 09:35:32

8 MR. SAWYER: Objection, form. 09:35:33

9 MS. RAY: Join. 09:35:34

10 A Can you repeat that? Can you rephrase 09:35:36

11 that? 09:35:37

12 Q Well, you answered earlier that you don't 09:35:39

13 know for sure why John Gardner asked you to be the 09:35:43

14 manager of Sandstone Group. 09:35:47

15 And so now I'm asking: Well, do you have 09:35:49

16 any understanding as to why you were selected to be 09:35:51

17 manager of Sandstone Group? 09:35:53

18 A Yeah, I -- my understanding is John knew 09:35:57

19 that I was -- that I was in the business of 09:36:06

20 representing start-up companies and also angel 09:36:09

21 investors in line with the solo practice I had at 09:36:15

22 the time. 09:36:20

23 Q Had you ever worked for John Gardner 09:36:22

24 before he asked you to be the manager of Sandstone 09:36:24

25 Group? 09:36:27

1 A I had not worked with John Gardner before 09:36:28
2 he asked me to be the manager of Sandstone Group. 09:36:32
3 Q Had you ever met John Gardner before 09:36:36
4 that -- that time he asked you to be the manager of 09:36:38
5 the Sandstone Group? 09:36:42
6 MR. SAWYER: Objection, form. 09:36:43
7 A I had not met John Gardner before he asked 09:36:43
8 me to be the manager of Sandstone Group. 09:36:46
9 Q So what were the circumstances under which 09:36:51
10 he reached out to you to -- to tell you that he 09:36:54
11 wanted you to be the manager of Sandstone Group? 09:36:56
12 MR. SAWYER: Objection, form. 09:36:59
13 A He called me to describe an opportunity 09:37:00
14 for me to represent a client. 09:37:12
15 Q How did he -- well, let me ask you this: 09:37:23
16 Did he say that he was referred to you by someone? 09:37:25
17 A Can you rephrase? Can you say that -- he 09:37:30
18 was -- referred to me? So somebody referred him to 09:37:32
19 me? Is that the -- 09:37:38
20 Q I -- 09:37:38
21 A -- question? 09:37:38
22 Q -- well, I'm asking -- well, let me take a 09:37:39
23 step back. 09:37:42
24 So you had never met John Gardner before 09:37:43
25 he called you about this opportunity with the 09:37:45

1 Sandstone Group, right? 09:37:48

2 A I had not met John Gardner before he 09:37:48
3 called me. 09:37:50

4 Q So -- so my question is: Why -- why did 09:37:51
5 he think to call you? 09:37:54

6 MR. SAWYER: Objection, form. 09:37:56

7 MS. RAY: Join. 09:37:58

8 A He told me that he had gotten my name from 09:38:02
9 Anthony Levandowski. 09:38:06

10 Q And what else do you remember about that 09:38:11
11 conversation when he called you? 09:38:14

12 A He called me to tell me that he was in the 09:38:15
13 process of forming an investment company and asked 09:38:20
14 if I would be interested in being his manager. That 09:38:26
15 was the gist of the first conversation. 09:38:30

16 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

1 THE VIDEOGRAPHER: -- I'm sorry. I have 01:19:31
2 to check and see if my recording overwrote 01:19:32
3 something. I'm sorry. 01:19:36
4 MR. JUDAH: Sure. Take a quick break. 01:19:37
5 THE VIDEOGRAPHER: Take a quick break. We 01:19:40
6 are going off the record. This is the end of Media 01:19:45
7 unit No. 6. We are off the record. 01:19:47
8 (A break was taken from 1:20 p.m. to 01:19:51
9 1:20 p.m.) 01:20:09
10 THE VIDEOGRAPHER: Okay. We are back on 01:20:11
11 the record. This is beginning of Media Unit No. 7. 01:20:25
12 The time is approximately 1:20 p.m. We are on the 01:20:30
13 record. 01:20:33
14 Q (BY MR. JUDAH) All right. So let me just 01:20:37
15 ask that again because we had technical issues. 01:20:38
16 A Sure. 01:20:42
17 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

2

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q

(BY MR. JUDAH) Were those communications

01:22:37

with Mr. Levandowski e-mails or -- or oral?

01:22:39

A

Oral, I believe.

01:22:45

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 MR. SAWYER: Objection, form. 05:04:17

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 Q And -- and you were introduced to 05:04:59

21 Mr. Nunnemaker by Mr. Gardner? 05:05:02

22 A I think so. Although, I don't recall that 05:05:09

23 introduction. 05:05:11

[REDACTED]

[REDACTED]